

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

MEGAN STANISLAW,)	CASE NO.:
)	
Plaintiff,)	JUDGE:
)	
vs.)	<u>NOTICE OF REMOVAL</u>
)	
CITY OF WARREN,)	
)	
Defendant)	

TO THE JUDGES IN THE UNITED STATES DISTRICT COURT, NORTHERN
DISTRICT OF OHIO, EASTERN DIVISION:

1. On April 13, 2021, Plaintiff Megan Stanislaw commenced an action in the Trumbull County Court of Common Pleas, Ohio, bearing Case No. 2021 CV 00377, entitled “Megan Stanislaw v. City of Warren,” praying judgment against Defendant. Said action is predicated, in part, on alleged violations of the Family Medical Leave Act and is brought pursuant to 29 USC § 2614. Said action is wholly of a civil nature of which this Court has original jurisdiction under the provisions of Title 29, United States Code, Section 2617(a)(2), and is one which may be removed to this Court pursuant to the provisions of Title 28 United States Code Section 1441(a) and (c), as being a civil action involving a claim or claims over which this Court has original jurisdiction and involving a claim or right arising under the laws of the United States, all of which more fully appears in the Plaintiff’s Complaint, a copy of which is attached hereto and incorporated herein by reference.

2. Said action also contains certain pendent state law claims over which this Court has jurisdiction under the provisions of 28 United States Code Section 1367.

3. A copy of the Summons and Complaint in the case aforesaid was served upon Defendant, City of Warren, Ohio, on April 15, 2021 under and by virtue of Rule 4.3 of the Ohio Rules of Civil Procedure.

4. Defendant attaches hereto, and files herewith, a copy of the Summons and Complaint served as aforesaid, as well as copies of all other process, pleadings and orders served upon them.

WHEREFORE, Defendant prays that the case presently pending in the Trumbull County Court of Common Pleas against it be removed to this Court and proceed herein according to law.

Respectfully submitted,

MAZANEC, RASKIN & RYDER CO., L.P.A.

s/John D. Pinzone

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CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2021, a copy of the foregoing Notice of Removal was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Counsel for Defendant City of Warren, Ohio

s/John D. Pinzone

JOHN D. PINZONE (0075279)